



Food Company, Inc.

One Dole Drive - Westlake Village, CA 91362-7300 - Phone (818) 879-6803 - Fax (818) 874-1103  
Email: richard\_dahl@na.dole.com

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Richard J. Dahl  
President and Chief Operating Officer

By Facsimile - 301-827-6870  
And U.S. Mail

June 1, 2005

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

**RE: Docket No. 2001N-0548; Food Labeling; Guidelines for Voluntary  
Nutrition Labeling of Raw Fruits, Vegetables and Fish**

Dole Food Company, Inc. provides these comments to the rule proposed by the Food and Drug Administration (FDA) to amend the nutrient values used in voluntary nutrition labeling of raw fruits, vegetables and fish. 67 Fed. Reg. 12918 (March 20, 2002); 70 Fed. Reg. 16995 (April 4, 2005).

As the world's largest producer and marketer of high-quality fresh fruits and fresh vegetables, Dole promotes a healthy diet rich in fruits and vegetables. Dole has assumed a leading role in nutrition education and research, and we support FDA's efforts to further educate consumers. We are concerned, however, that the nutritional values set forth in FDA's proposed rule for labeling may add to consumer confusion about government nutrition guidelines and thus may undermine our shared mission to increase Americans' consumption of fruits and vegetables.

It is important to have consistency in the nutrition information that is communicated to the public. FDA's proposed changes to the nutrition labeling values for certain nutrients in single-served raw fruits and vegetables appear inconsistent with the data and results from updated and comprehensive nutrient information from the United States Department of Agriculture's (USDA) National Nutrient Data Bank (NNDB) for Standard Reference, Release 17.

In addition, FDA's proposed values appear to be not representative of broader (and therefore more reliable) samples. For example, with respect to sodium in bananas, FDA's sample is limited to only seven data points. In contrast, USDA's NNDB uses forty-five data points. Dole urges that FDA utilize all credible data available - not a limited set of

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data from one study – in order to establish accurate guidelines for voluntary nutrition labeling of raw fruits and vegetables.

Dole has reviewed the comments submitted to FDA by the International Banana Association (IBA) and agrees with IBA that FDA's statistical methods may have resulted in imprecise conclusions. Dole believes that the current USDA NNDB nutrient values should be considered for utilization in the calculations for nutrition labeling. This would help to ensure that the labeled values are most representative of the food's nutritional profile and consistent with government and industry nutrition guidelines.

Dole appreciates FDA's consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Dahl", with a stylized flourish at the end.

Richard Dahl  
President and COO  
Dole Food Company, Inc.